

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**LISA BARBOUNIS,**

*Plaintiff*

v.

**THE MIDDLE EAST FORUM, et al.,**

*Defendants.*

**Case No. 2:19-cv-05030-JDW**

**SCHEDULING ORDER**

**AND NOW**, this 31st day of January, 2020, following a pretrial conference with counsel for the Parties, and pursuant to Federal Rule of Civil Procedure 16 and Local Rule of Civil Procedure 16.1(b), **IT IS ORDERED** as follows:

1. Within fourteen (14) days of this Order, the Parties shall meet and confer to set aside dates to hold open for depositions before the close of discovery. The Parties shall submit a letter to the Court, via email to [Chambers\\_of\\_Judge\\_Wolson@paed.uscourts.gov](mailto:Chambers_of_Judge_Wolson@paed.uscourts.gov), that identifies the dates that will be set aside for these depositions;
2. All motions to amend the Complaint and to join or add additional parties shall be filed within 14 days of the date of this Order;
3. The Court will hold a telephone status conference with Counsel for the Parties on April 3, 2020 at 10:00 a.m. Counsel for Plaintiff shall initiate the call, and once all counsel are on the phone, call Judge Wolson's Chambers at (267) 299-7320;
4. Affirmative expert reports, if any, are due by May 1, 2020;
5. Rebuttal expert reports, if any, are due by May 29, 2020;

6. A party intending to offer lay witness opinion testimony must disclose the name of any witness who will offer such an opinion and a brief summary of each such opinion at the same time the expert reports are exchanged;

7. The Parties shall complete all discovery by July 2, 2020;

8. Any dispositive motions shall be filed on or before July 17, 2020;

9. No later than July 31, 2020, counsel for each party shall exchange a list identifying each exhibit the party expects to offer at trial;

10. No later than August 7, 2020, each party shall file a pretrial memorandum. The Parties shall include in their pretrial memoranda all information required by Fed. R. Civ. P. 26(a)(3) and Local Rule of Civil Procedure 16.1, including but not limited to the following:

- a) the identity of each expert witness to be called at trial by the party with a summary of the expert's opinions;
- b) the identity of each fact witness to be called at trial with a concise statement of the nature and substance of the expected testimony (witnesses not listed may not be called by that party in its case-in-chief);
- c) designations, specifically citing those portions by page and line number, of written or video deposition testimony to be offered at trial;
- d) an itemized statement of damages or other relief sought; and
- e) a statement of any anticipated important legal issues on which the Court will be required to rule;

11. All *motions in limine* shall be filed on or before August 14, 2020. Responses, if any, shall be filed no later than August 28, 2020;

12. No later than September 11, 2020, each party may submit proposed jury questions for *voir dire* via e-mail in Word format to Chambers\_of\_Judge\_Wolson@paed.uscourts.gov with “*voir dire* questions” in the subject line;

13. No later than September 11, 2020, the Parties may file proposed jury instructions on substantive issues with an electronic copy e-mailed in Word format to Chambers\_of\_Judge\_Wolson@paed.uscourts.gov with “jury instructions” in the subject line. Proposed jury instructions should be submitted as a joint submission, and for any instructions on which the Parties do not agree, plaintiff’s proposal shall be in italics and defendant’s submission shall be in bold, with citations to the sources of law upon which each proposed instruction is based;

14. On or before September 30, 2020, the Parties shall submit to the Court all exhibits that the Parties intend to use at trial. If the Parties intend to present evidence electronically, then the exhibits shall be submitted electronically (on a memory stick, CD, or DVD) with each exhibit as a separate file. If the Parties do not intend to present evidence electronically, then the exhibits shall be submitted in a binder, with each exhibit separately tabbed. Exhibits shall be consecutively numbered, and the Parties must confer in advance of the submission to eliminate duplication in the exhibits that they submit. The exhibits must be accompanied by a table of contents that lists each exhibit and sets forth whether there is an objection to the admission of the document in evidence at the trial and the basis for any such objection;

15. A final pretrial conference will be held on October 2, 2020, at 10:00 a.m. in Room 3809, United States District Court, 601 Market Street, Philadelphia, PA 19106. Counsel shall be prepared to discuss any pending *motions in limine*, objections to witnesses and exhibits, and any stipulations of uncontested facts;

16. Trial is scheduled for October 5, 2020 at 9:30 a.m. in Courtroom 3B, United States District Court, 601 Market Street, Philadelphia, PA 19106; and

17. Counsel for all Parties shall refer to Judge Wolson's Policies and Procedures regarding all matters of discovery and correspondence with the Court.

**BY THE COURT:**

/s/ Joshua D. Wolson  
JOSHUA D. WOLSON, J.